DOCUMENT RESUME

ED 315 518 CE 053 757

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TITLE The Search for a Bottom Line in Vocational Training: What Lessons Are Offered by the Job Training Partnership Act?
INSTITUTION MPR Associates, Berkeley, CA.
SPONS AGENCY National Assessment of Vocational Education (ED), Washington, DC.
PUB DATE Oct 88
CONTRACT 300-87-0011
NOTE 28p.; Paper commissioned for the Conference on Outcome-Based Policy Options for Vocational Education (Washington, DC, June 1988). For related documents, see ED 283 020, ED 290 881, ED 299 412, ED 297 150, CE 053 752-774, and CE 053 783-797.
PUB TYPE Reports - Evaluative/Feasibility (142) -- Speeches/Conference Papers (150)

EDRS PRICE MF01/PC02 Plus Postage.
DESCRIPTORS Behavioral Objectives; Competence; Competency Based Education; *Educational Improvement; Employment Programs; Federal Legislation; Federal Programs; *Job Training; Outcomes of Education; Postsecondary Education; *Program Effectiveness; *Program Implementation; *Standards; *Vocational Education
IDENTIFIERS *Job Training Partnership Act 1982

ABSTRACT

During the years since 1982 when the Job Training Partnership Act (JTPA) was passed, program and management practices have evolved in ways quite different from JTPA's much-criticized predecessor, the Comprehensive Employment and Training Act (CETA). The most significant evolution has been the strongly results-driven nature of the program accompanied by the development of formal national, state, and locally administered systems of outcome measures and standards for aggregated program achievement performance standards. Two other practices that have evolved over the several years of full implementation of JTPA have been performance-based contracting and competency-based programming. The performance standard approach has much in its favor, notwithstanding important issues about its effects on the design of programs and the selection of clients. The performance contracting system may conceal rather than reduce administrative costs, and it may result in serving only those clients easiest to train and place; however, it has merit. Finally, the competency-based program movement has been slower to develop and is harder to evaluate, although it has good points. These three aspects of the JTPA have implications for adult vocational education. JTPA has shown that is possible to establish a program driven by clear, measurable outcomes, and vocational education should move in that direction. At the same time, JTPA could use the training expertise of vocational education. (46 references.) (KC)

ED315518

THE SEARCH FOR A BOTTOM LINE IN VOCATIONAL TRAINING:

WHAT LESSONS ARE OFFERED BY THE JOB TRAINING PARTNERSHIP ACT?

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October, 1988

U.S. DEPARTMENT OF EDUCATION
Office of Educational Research and Improvement
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ACKNOWLEDGEMENTS

Thanks to Deborah Axcel and Sean Zielenbach for able research assistance, including, most painfully, hundreds of telephone calls to arrange for interviews of local and state employment and training officials. Larry Bailis and Andy Hahn assisted with questionnaire design and analysis, and Jonathan Ramljak helped with bibliography and production. MPR Associates commissioned the paper and the Department of Education is paying for it. The rest is my own fault.

When the Job Training Partnership Act was passed with some fanfare in 1982, it culminated a bi-partisan policy salvage job of significant proportions. The new federal Administration had little interest in employment and training for the disadvantaged, and had only to cite the well-publicized difficulties of CETA as the basis of its skepticism. CETA had peaked in annual budget at over $12 billion in 1979, and had become—for reasons principally of bad management and unlucky public relations almost from its beginning in 1974—a favorite whipping boy of critics of "social programs."

The new Administration, looking for opportunities to cut programs from the budget, first drastically cut CETA's budget, then opposed its renewal when it expired in 1981. It was not surprising to see first, opposition, then—in the face of clear support in both parties, in both branches, for doing something in employment and training—only lukewarm support for new job training legislation to replace CETA. Nonetheless, by mid 1982, Administration support came in part because a bipartisan consensus was clearly building for a formulation acceptable both to House and Senate sponsors and to the few in the Administration who favored employment and training legislation.

The elements of this formulation—reflected in the Bill which was finally passed and signed in October, 1982—included elimination of public service employment and most forms of subsidized work experience, the elevation of the role of the private sector through Private Industry Councils, increased authority for the states, and a variety of measures designed to promote more rigorous, less expensively administered, results-oriented management.

Coupling these elements together with a reduced budget request (less than $4 billion) made it possible to sell JTPA as a lean, mean, training-oriented, anti-make-work, pro-business, bottom-line driven initiative in the spirit of public-private partnership. This was not "son of CETA," but a more distant relative. And so it has been in implementation.

Despite normal inertia at all levels, from the U.S. Department of Labor through local Service Delivery Areas, JTPA—now in its seventh year, but only in its fifth year of full-scale implementation—has developed into quite a different employment and training system from its predecessor. States have become major players, often at the expense of local governments, which were firmly in charge during CETA. The federal Department of Labor spent the first several years of JTPA's existence avoiding any programmatic role at all, short of toting up results, and most states were perfectly willing to pick up the slack. While the organized private sector is hardly in the driver's seat envisaged by some, certainly many more private employers are involved in JTPA than were during CETA. Aside from the drastic reduction in budget, which has had the most dramatic impact, the institutional and political changes which have followed are,

in some ways, the more noticeable. Quieter, less noticed still, but in some ways even more significant, are the changes in program and management practices which have resulted from JTPA's provisions calling for more outcome-oriented accountability—notably the requirement that governors monitor the performance of SDAs against certain outcome standards. CETA was heavily procedural, that is focused on participatory requirements for "significant population segments," targeting devices, and slot levels—and almost before it got started it was burdened additionally with such confusing priorities as "public service employment for countercyclical economic stimulation," an administrative and public relations disaster.

JTPA, on the other hand, has been almost fanatically outcome-driven, and both Administration and Congress have, remembering CETA, strongly resisted "confusing" amendments even when technical and even programmatic adjustments were badly needed.

The most significant outcome-oriented practice has been the development of formal national, state, and locally-administered systems of outcome measures, and standards for aggregated program achievement. This so-called "performance standard" system—driven by a nationally-derived set of outcome numbers against which the performance of local administrative entities, called Service Delivery Areas, or SDAs, (and, in turn, states) are measured—has become the basis for judgement about the effectiveness of local programs, and, when they are aggregated, about the system as a whole. This rigorously-applied set of measures and standards has had the effect of turning the system on its head to comply. The measures have recently been expanded, and there have been annual adjustments in the standards, but in general there has been great consistency over the several years of JTPA, providing a good basis of experience with outcome measures for a national program.

Two other practices that have evolved over the several years of full implementation of JTPA have either hardened or mitigated the impacts of the performance standard system. The first is a set of approaches to "performance-based contracting" which, while not mandated—or even mentioned—by JTPA, has quite literally swept the system in the last three years. The second practice, authorized by JTPA, but little emphasized by the performance standard system in the first few years, is the development of competency measures for program outcomes. To some extent, the movement in JTPA towards competency measures, and in turn to competency-oriented training, though specifically authorized only for youth, has been a reaction against the performance standard system, which has emphasized job placement over other outcomes.

These three practices—performance standards, performance contracting, and competency-based programming—all have implications for the management of the vocational education system, and thus will be the focus of this brief review. I will argue that the performance standard

approach has much in its favor, notwithstanding important issues about its effects on the design of programs and the selection of clients. With appropriate modifications for difference of purpose, it ought to be emulated in large part by revised vocational education legislation.

I will describe the performance contracting system which has evolved in the last several years, and examine the reasons for its development, but will suggest that in local application the approach may have accumulated some unintended but important negatives. It may simply conceal, rather than reduce, actual administrative costs, certainly not a result intended by the designers of JTPA. As performance contracting has developed as a local response to meeting performance standards, it appears that the procedure may in some instances have had the effect of screening out harder-to-serve, more disadvantaged (and therefore often more expensive) applicants by encouraging or permitting local contractors to seek quicker, cheaper results, with likely compromises in quality of services. Yet its simplicity and apparent efficiency argue for finding other ways to compensate for these unintended effects without eliminating performance contracting.

The competency-based programming movement is a slower and harder development—because it has to do with actual design of curricula and services—which has developed more in the youth area (where, under the rubric of "employability enhancement," it is for the first time this year an authorized national performance measure). Though most localities have used the approach in some programs, the concept has not spread as quickly through the system as performance contracting has, largely because it is hard to do. But recent changes in the performance standards system may have the effect of encouraging more extensive development, giving local administrators the wriggling room to succeed according to performance standards yet still serve more complicated and expensive clients.

Taken in appropriate combination, these three outcome-oriented management and program planning devices may indeed evolve into a results-oriented system of training and education for the disadvantaged. I will suggest that they have not yet matured but that they are worth emulating by vocational education, given certain cautions.

I will discuss these three aspects of a performance system under JTPA one at a time, indicating what is presently understood about each, presenting data and opinions drawn from a survey of nearly 100 SDAs and twelve states as well as from other, earlier reviews of JTPA, and from a series of free-ranging interviews with experienced local and state practitioners. Finally, I will make a few recommendations for vocational education to be drawn from this experience.

At this point, a final introductory caveat: this is a personal review, written by one who has worked with CETA, worked on planning for JTPA, and who has watched JTPA's

implementation closely. The surveys and interviews were conducted to ascertain the extent of use of certain practices in the field, and to solicit the opinions of local and state officials about their evolution and their meaning. I posit no new models, and pretend no great science. To the contrary, the survey was open-ended, the questions searched for opinions more than numbers, and the analysis of the results was only crudely statistical. But we did talk to more than a hundred people who work with JTPA at the local level, another twenty or so who work at the state level, and a dozen or more who have watched or worked with JTPA as a national program. However, both the conclusions drawn from these conversations and the recommendations for what they may mean for adult vocational education are my own.

Performance standards and the simplicity impulse

Section 106 of the Job Training Partnership Act consists of two pages of requirements introduced by the following phrase: "Congress recognizes that job training is an investment in human capital and not an expense. In order to determine whether that investment has been productive . . ." The Act then specified that the efficiency of the investment would be measured by "increased employment and earnings and by reduced welfare dependency." This, contrasted by all to CETA, represented a shift from counting inputs to measuring outcomes, from influencing program through defining procedural requirements to doing so by measuring outcomes. The Department of Labor was charged with designing measures and establishing standards by which states, and in turn local programs could be evaluated and judged.

As apparently intended by Congress and practiced by the Department of Labor (and overseen vigorously by the Office of Management and Budget), these measures and standards were to be few, were to be easy to aggregate and explain, and were to be easily used as a device to communicate effectiveness of the program to a cynical world. Therefore, though no one ever said it out loud, they had to remain simple. The shadow of CETA loomed large: it was too complicated, too procedural, too social-program-y, ultimately unmeasurable, and not susceptible to the bottom-line mentality presumed to be held by private business people. Though the measures differed for youth (14-21) and adults (22 and up), the first set issued by DOL was straightforward:

Adult measures
- entered employment rate
- cost per entered employment
- average wage at placement
- welfare entered employment rate

Youth measures
- entered employment rate
- positive termination rate
- cost per positive termination

Federal standards were established, suggesting numerical performance levels, and an adjustment methodology was developed, permitting governors to modify the standards by application of local measures which might suggest either greater difficulty of achievement or other priorities. Though the actual standards have changed over the years, they have remained fairly consistent: the entered employment rate standard has been around 60% for adults, 40% for youth; the welfare entered employment rate has been around 50%, average cost per adult entered employment a little over $4,000, and average wage a little less than $5.00/hr. The added youth standards have required that roughly 75% of all participants "terminate positively," that is either enter employment, or demonstrate certain approved competency levels, and that those standards be achieved at an average cost per positive termination of around $5,000. The standards have been set so that about 75% of all SDAs achieve them, and adjusted upward or downward for each new year depending upon the previous year's experience.

In reviewing programs and establishing standards, governors were to provide a statement of goals and objectives for the state, numerical standards against which to judge local and statewide performance, and could, if they wish, propose an "adjustment methodology" which would allow Service Delivery Areas (SDAs) to adjust standards to reflect local conditions. In addition, they could propose possible additional measures for statewide priorities and an incentive and sanctions policy for good or poor local performance against the standards.

In turn, the local Service Delivery Areas (there are some 600, oriented to labor market areas, covering the country), would:

- prioritize local needs
- propose local adjustments to performance standards
- decide who administers the program locally
- select service providers, and
- design and carry out service strategies in each area

And so it began, first applied to the "Transition Year," 1983-84. (Until then, CETA continued to operate under Continuing Resolution.) States worked hard to adapt to a newly prominent role, the federal Department of Labor tried to back off its former aggressive procedural oversight, and locals tried to toe the line. In truth, according to our interviews of senior state and local people who were working in the system at the time, while there were concerns from the beginning about the possible effects of such placement-oriented performance standards, criticism

was muted. As one put it, "most of us (employment and training professionals) were so relieved that there was legislation at all that we tended to keep our mouths shut about our reservations and try to make sure that we met or exceeded any standard the feds issued" (Brandeis interview, 1988).

And meet them they did. From the first year, the system has met or exceeded, on the whole, the numerical standards issued by the U.S. Department of Labor. DOL consciously set out to issue "minimally-acceptable" numerical levels so that the standards would not unduly distort program design. While the standards have varied slightly from year to year, and generally have trended upward, they have remained in the same neighborhood for the first five years.

Some states and SDAs have modified standards according to local conditions, but not many, and not by much. Of the SDAs we interviewed, 22% reported that they had proposed modified standards at least once in the five preceding years. On average the request was for only a "point or two" in adult entered employment rates, never for cost standards, and in two cases there had been requests for a reduced level of expenditures on youth (not a performance standard, but rather a JTPA requirement with waiver procedures). Only two of the twelve states we interviewed ever modified the federal standards statewide. Massachusetts raised the numerical standards "across the board," and South Carolina reported using federal standards as a "minimum, with a tiered incentive system rewarding SDAs for performance exceeding the standards" (Brandeis interviews, 1988). The remainder simply applied the standards issued by DOL.

Thus, even though elaborate provisions had been made for "the Governor" to propose modifications, and suggestions were made for regression formulas to be used to factor in local and statewide circumstances, it appears that the course of least resistance was followed in most cases by most states; and sub-state modifications, while relatively more common, were modest. Accordingly, it is possible for the purpose of this review to make generalizations which can be presumed to apply to most SDAs and in most states.

It is clear from our 1988 survey, as well as from most other sources, that the performance standards system so far has worked. A few bottom line measures were proposed, numerical standards followed, nearly every state and most SDAs adopted them as proposed, and most organizations involved in JTPA achieved the proposed standards for program outcomes. While the standards were keyed fairly low (at the 25th percentile), to make compliance likely, the attitude of local and state administrators was that whatever they were, they had to be met. It was a matter of political survival for the system. As one SDA staff director told a 1985 study of JTPA:

> "Our first job was to prove that JTPA wasn't CETA. That means to be efficient and avoid fraud and abuse. We've had no fraud and abuse. And our placement rates and costs beat the federal standards—that proves we're efficient." (Grinker-Walker, 1985)

Policy lessons about performance measures and standards

There is an underlying policy question about the application of performance standards under JTPA. That is, do performance standards achieve the "investment in human capital" agenda of the Act, or does the approach artificially force states and localities to opt for quick numbers which will yield only short-term results? Unfortunately there are no reliable data which will answer that most basic question. There are pretty good data on which clients were served, on where how many of them were placed and at what salary, and on how much the services they were provided cost. But there is little systematic information on what services were actually provided and virtually none at all on who else might have been served had the programs been designed or supported differently—or even on who applied for services but was rejected on grounds that they might not succeed. Instead, we must rely on very partial official data on a few aggregate measures, and on opinion and self-reporting by professionals involved in the program.

When we began to ask for those opinions, we started with a few questions in mind. Were the performance measures being applied the right ones? Were the standards high enough? Did the standards achieve the desired management effects? Did they affect the design of services? The choice of participants? Were there important negative side effects? We posed those questions in various ways to the SDA and state people with whom we spoke; their answers, our own experience and a close reading of other reports helped to form the replies given below.

Are the measures the right ones?

The JTPA system has been truly converted to performance toward outcome measures, and in a remarkably short time. While there are a few holdouts for a more elaborate set of outcome measures—several measures for youth competency gains not now used, for example—almost everyone agrees that entered employment rates, welfare reduction rates, employment wages and cost measures make sense. Fully four-fifths (82%) of those we interviewed thought that the new national measures and standards "moved in the right direction"—towards long-term employability—while a handful echoed one opinion that they "watered down a tough system that works" (Brandeis survey, 1988).

Are the standards high enough?

There is near consensus that linking each year's performance standard with last year's actual performance makes sense, and that the standards which result are "about right, because we are pushed each year to do a little better than last year. . . " (Brandeis survey, 1988). There is some objection to the wage standard, reflecting the concern that it is too easy to settle for poor, low-paying jobs—"$5.00 an hour just isn't a very good job, and with that as a required average, it means we are settling for some jobs at even less, and I can't see where that's much progress for most of our folks—even the welfare moms can do better than that staying on welfare. . . ." (Ibid.) While it is not scientific, because the question was not pursued across the board, it appears that the SDAs differ on this question, with those in strong state or local economies feeling the wage standard may be too low, while those in weaker local economies think it is about right, or even high. The most commonly expressed concern about the standards is about the unintended effects on the selection of clients, which I will discuss below.

Have the standards achieved the desired management effects?

Again the answer is largely positive. In view of the reputation of CETA, mentioned by almost everyone with whom we spoke, it was essential to be able to claim some accomplishments. "Meeting our performance standards has helped us with our local employers, especially our PIC members, and turned around our image with the general public. I'd never want to do it another way," said one SDA director, "but I'm still privately worried that it has changed the way we target our clients—getting folks we are surer to succeed with rather than the ones who need our help the most." (Ibid.)

Has the system affected the design of program services?

The principal effect of the performance standard system appears to have been the development of performance contracting, which is important enough to warrant a separate discussion later in this review. Most SDAs have moved to subcontract nearly all program services, and most have established performance contracting procedures, distancing themselves from actual program design thereby. Most appear to be generally comfortable with the oversight, management oriented role subcontracting assigns them, but several expressed concern about the effects. One large-city SDA director described his performance contracts as "a black hole. As long as they report achievement of their contracted numbers, and my monitors confirm that the people and their jobs are for real, I know hardly anything about the content of the services we offer. It makes me very nervous." (Ibid.)

Have performance standards affected the choices about who participates in JTPA?

This is the area of greatest controversy in JTPA. Do business participation in JTPA, the impulse for efficiency and cost saving, the performance standard system, and performance contracting conspire to impel the system to serve the easiest among the eligible population to serve? In simpler form, the question even spent a day or two in national presidential politics, associating the question with Senator Quayle, one of JTPA's two Senate sponsors and widely regarded as its principal sponsor.

Disaggregated, the question generally focuses on the contribution of single factors—the role of private industry council members, of performance standards, of performance contracts, of budget reductions—to what appears to be a subtle but generally accepted practice of "serving those most likely to benefit from our services." The well-regarded Grinker-Walker review of early implementation concluded that "Under JTPA there has been an emphasis on quick results and inexpensive placements" and attributes the impulse to private sector influence, and the tendency to seek compliance with requirements more than to meet long-term goals, with "an impact on their choice of programs and applicants." (Grinker-Walker, 1985)

Three years later, perhaps reflecting shifts in the way the standards are administered nationally, state and SDA officials are not so sure. Programs are modestly longer in duration (about 18 weeks on average, up from the 14.2 documented by Grinker-Walker), and the majority of people to whom we talked either thought that "creaming" was not taking place in their jurisdiction ("over 75% of our participants are welfare recipients; how can that be creaming?") or that "it probably used to occur, but not this year—we'll be targeting higher-risk adults, more welfare recipients, and more school dropouts" (Brandeis survey, 1988).

And indeed that appears to be the trend. In Program Year 1988, for the first time, DOL has issued new program measures and new standards, creating a "menu" of twelve standards from which states and SDAs may choose eight. Identifying the new issuance with the goal of "increasing services to at-risk individuals, particularly youth, to encourage provision of training which is relevant to long-range employability, and to encourage increased provision of basic skills training," the Department also introduced new measures for post-program achievement, including job retention.

It seems likely that the impulse for simplicity which led to concentration on a few basic outcome measures, and the essentially short-term character of those measures, more than the existence of measures and standards themselves, did contribute to a "creaming" trend in participant selection in JTPA. But it was hardly universal across states and SDAs, and it appears that certain of the standards made a bigger contribution than others. For example, the National

Commission on Employment Policy concluded in a review published just this Fall that states and localities which focused on exceeding (by coming in under) the cost standard "tended to serve fewer hard-to-serve clients . . . and tended to design less intensive services." (NCEP, 1988)

Similarly, SDAs surveyed for the NCEP study which emphasized exceeding, rather than simply meeting, the placement and other standards also tended to select easier people to serve and to offer fewer basic skills training and other long-term-oriented services. And more of both took place in states where incentives emphasized (and rewarded) exceeding the standards. On the other hand, where states offered incentives for targeting service to particular populations (e.g., school dropouts or welfare recipients), SDAs met those objectives with longer-term, more expensive programs.

All of which seems to make two points. First, it is not at all clear that the performance standards system itself produces the "creaming" effect which has so concerned critical observers of JTPA, even though in certain applications it clearly contributes to that effect. Second, it appears that by emphasizing different objectives (including "anti-creaming" measures like population targeting) through incentive payments, states and localities can apply performance standards to any measurable objective.

Should Vocational Education pay attention to this experience? Clearly, yes. There are important differences in the situation faced by re-designers of vocational education. The federal dollars are a less significant portion of the whole program, to be sure, and the relationship between the Department of Education and the state departments of education which will administer federal funds certainly differs from DOL's more commanding relationship with states, if only because of the dollar difference and the historic independence of state departments of education. But notwithstanding those differences, performance standards tied to performance objectives, with incentives both at the state and local level tied to selected priorities, probably makes sense for most of the same reasons they have been so successful under JTPA. A "bottom-line" mentality makes for better public relations, more serious business involvement, and more programmatic attention to outcomes than either to inputs or procedures. While JTPA's experience has been mixed on the subject of targeting the most disadvantaged clients, it has made clear that states and the federal government can "tweak" the system by providing for adjustment procedures and incentives for meeting desired outcomes. That has appeal for both managerial and public policy reasons and ought to be incorporated in any revision of national vocational education policy and into practice at the state and local levels.

Performance Contracting: ruse or tool?

If performance measures and standards have been the federal government's way of seeking accountability for outcomes, and adjustment methodologies and incentives have been the states' method for incorporating their own priorities, performance contracting has been the local service delivery system's response.

Even though there is neither mention nor implied permission in the JTPA legislation for such an approach, fully four-fifths (81%) of the SDAs we surveyed reported using performance contracts with their subcontractors, defined simply as a contracting procedure in which(typically) an SDA ties all or part of its payments to subcontractors to the achievement of agreed upon measurable outcomes. Since fewer than 15% of SDAs provide all of their own training, "in house," as it were, and two-thirds subcontract at least half of all their training funds, this is a substantial penetration of the system.

Unlike the data on the system's response to performance standards which, though available only on a few simple measures, are extensive, official, and readily accessible, not much was systematically available to us on performance contracting.

We began with some experience with state and local practitioners and had formed beginning impressions, but decided to do a survey of a fair sample of SDAs to find out more about both this practice and about competency-based programming.

During July and August of 1988, we surveyed 84 Service Delivery Areas and twelve states by telephone and reviewed the results of several related surveys undertaken by other researchers. A closed ended instrument was utilized for our survey, and a purposive sample drawn in order to obtain a wide range of SDA types and labor markets. Since random sampling was not utilized, readers should not assume that the proportions of responses presented in this paper are scientifically representative of the entire group of over 600 SDAs. However, since the conclusions seem to square with the findings of several other surveys over the past few years, and with anecdotal evidence provided by an active network, we feel comfortable with the results.

We were interested in several aspects of performance contracting: the extent to which the practice was used in local service delivery areas, why local officials who used it did so, what they perceived as its benefits from both their own and the clients' points of view, and what they perceived as the disadvantages, from both points of view.

How widely is performance contracting used?

As shown below, both our survey and other research indicate that the vast majority of JTPA SDAs now use performance contracting for at least some of their contracts with service deliverers; our survey suggests that this mechanism is used most frequently for vocational skills training in the classroom setting, and least often for job search assistance. The combined results from several questions yield the following summary:

Exhibit 1

Extent of use and setting for performance contracting
Brandeis Survey (PY 1988)*

One or more subcontracts	80.9%
Basic education	50.0%
Pre-employment/work maturity	53.1%
Classroom vocational skills	73.4%
On-the-Job	48.4%
Job search assistance	32.8%

* N= 68 respondents

In addition to our own survey, Bailis (1985) conducted a smaller survey with a stratified random sample of 28 SDAs to discover in what situations such contracts are used. As early as three years ago, over 90% reported using performance-based contracts for class-sized vocational skills training contracts (the type most likely to be applicable to adult vocational education), while a smaller but still significant number (80.8%) reported using them for other types of subcontracts.

Why did administrators opt for performance contracting? What do they consider the advantages to be? The benefits?

SDA officials who have chosen performance contracting tend to say that they have done so in order to make it easier to achieve their performance standards or to simplify program administration; they do not generally say they have adopted this mechanism to improve the quality of training.

As shown below (Exhibit 2), the most frequently-cited advantages of performance contracting for administrators were three: it allowed them to reduce apparent administrative costs by including the costs of program service administration in fixed unit prices for subcontracts, it allowed for "greater accountability," and it allowed them to key subcontract performance and actual payments to accomplishment of performance outcomes.

Exhibit 2

Advantages of performance contracting (from administrators' point of view)*

Reductions in (or increase in ability to hide) administrative costs	59.6%
Better accountability	57.7%
Easier to meet performance standards	48.1%
Easier administration	36.5%
Better training	21.2%
Other	19.2%

*N = 68

As indicated below (Exhibit 3), fewer than half of the administrators adopting performance contracting thought that its benefits included either better training or better placement. Here is how the responses summarize:

Exhibit 3

Benefits of performance contracting from administrators' point of view)*

Better training	40.4%
Better placement in jobs	36.5%
Better recruitment of clients	5.8%
Other benefits	7.7%

*N = 68

One SDA director summarized the views of her colleagues best when she said, "Look, the way I see it, performance contracting isn't about services, it's about management. It costs more than the law allows formally to run these programs, so we include legitimate costs of administration in fixed price contracts and call it all training costs. And we have to meet performance standards, so the contracts are drawn so that we pay for performance according to the standards we have to meet. It's as simple as that" (Brandeis interviews, 1988).

What were the disadvantages and problems with the approach?

When viewing it from their own point of view, SDA staff tend to see three interrelated problems with performance contracting: (a) producing excessive concern for numbers, "churning people out of the system in order to meet performance standards" while (b) providing little incentive for "quality," but, on the contrary, (c) providing disincentives to serve the hardest-to-place. (Exhibit 4)

As is shown in Exhibit 5, when pressed to review these disadvantages from the clients' vantage point, the administrators stressed (a) "creaming"—the likelihood that certain applicants were being excluded from programs because of performance contracting, and (b) effects of the preoccupation with numbers on the quality of training.

Exhibit 4

Disadvantages of performance contracting (from administrators' point of view)*

Creaming	27.9%
Excessive concern with numbers	27.9%
Problems with timing or level of reimbursements	25.0%
Lack of standardization	8.8%
Difficulties in monitoring	8.8%
Other Drawbacks	32.3%

*N = 68

Exhibit 5

Administrators' judgments about disadvantages from clients' point of view*

Creaming	32.3%
Concerns about quality or quantity of training received by clients	30.8%
Concerns about churning of clients	20.6%
Lack of incentives to provide support services	8.8%
Others	8.8%

N = 68

While roughly two-thirds (69%) of the SDA representatives said that they had systems in place to "assure quality" and "avoid creaming" in performance contracts, there are still two causes for concern. First, this means that about one third of those we interviewed simply put out the contracts and relied on invoicing systems to track accomplishments. They reported no system to guarantee quality. Secondly, many of the SDAs that did have systems in place were relying only on written documentation or contract provisions to assure quality, and reported no physical or file monitoring or audits.

Finally, both SDA people and state officials we interviewed suggested that many JTPA subcontractors have found performance-based contracting problematic. More than half (52.9%) of the SDA representatives in our sample indicated that some or all of their subcontractors felt this way, primarily because of funding issues. Community-based organizations are particularly vulnerable to systems that do not provide payment until clients complete their programs, and public agencies are often concerned about their ability to enter into any subcontract which cannot guarantee that payments for staff expenses will be reimbursed.

Community-based organizations also tend to indicate that the combination of JTPA performance measures and performance contracting presses them to serve people with fewer barriers to employment than they would choose to serve. For example, a 1984 survey of more than 300 community-based organizations conducted for the National Youth Employment Coalition found that nearly half (47.9%) of them thought the current system forced creaming.

Policy lessons (and questions) from performance contracting

There are some key policy questions which emerge from this picture of performance contracting, both from the point of view of JTPA itself and from that of anyone looking at JTPA for applicable lessons for another program. Here are a few:

- Does the approach impel undesired targeting of clients?
- Does it affect the quality of services by stressing inexpensive or short-term programs?
- Does it allow or even foster abuse by lumping together service and administrative costs?

Although the term "creaming" has no universally accepted definition, it is generally used to mean avoiding service to clients who are the hardest to place. The discussion vis a vis JTPA has taken on a new subtlety, not generally present in CETA. The original legislation requires that services be offered to "those who can benefit from, and those who are most in need of, such opportunities . . ." (Sec.141(a)). Neither term is defined by the Act, but that set of phrases has set up the basic dialogue about whom JTPA is to serve.

It is clear from every major study undertaken of JTPA that both client selection and program design have been influenced by some combination of performance standards and contracting procedures, with local and state officials clear from the beginning that they believed that the law intended them to serve, as one SDA administrator described it, ". . . persons first, who are eligible, and secondly, who need what we have to offer." (Grinker-Walker, 1985). Another said, in reply to a question about creaming, "we are simply not concerned with the issue. Performance-based contracting leaves us no alternative but to avoid the high-risk client." (Ibid.)

Another, interviewed this summer, said, "Contractors are going to get paid on the basis of placement, period. You're going to make your money on those easiest to place, just those the program ought to be serving. JTPA is a performance-driven program which tries to get people through programs as quickly and efficiently as possible and into jobs. If you're going to do that you have to look for applicants who are going to succeed" (Brandeis interview, 1988).

It seems that many in the system do not regard the phenomenon as a problem. That was true of a slim majority of SDAs in our sample (54.0%), who denied that there was any problem of creaming in their own agencies. However, a majority of those who admitted that creaming was a problem (55.2%) attributed it to performance contracting, as opposed to only about a quarter (23.0%) who attributed it to performance standards, and about two-fifths (39.6%) who felt that their testing and assessment procedures led to creaming.

Most of those we surveyed thought that treating the question of one of "creaming or not creaming" was too simple. The same majority who thought that creaming was a problem they had encountered also thought that JTPA's performance criteria and contracting procedures had also had an impact on the design and content, not just the duration of program services.

On the other hand, as in the case of performance standards, it appears that the impact on services need not be negative. Several local officials suggested that performance contracting can be used to achieve any desirable end, including service to the more at-risk of the eligible pool of potential clients. Not all SDAs are using performance contracts simply to maximize placements and minimize costs. Some are integrating other performance objectives—such as targeting on specific populations or providing incentives for certain skill areas—into performance contracts with good effects.

Brandeis' Center for Human Resources, the Washington-based Center for Remediation Design, and others have been urging SDAs to take a "tiered" approach to program design and client selection, which uses performance contracts to produce a mix of harder-to-serve clients being served with more extensive, expensive programs, together with other programs involving

more employable clients in shorter-term, less expensive programs. Both suggest that it is possible to tie performance to these other objectives, while still achieving performance results which meet or exceed required SDA averages (Youth programs, Winter, 1987).

There are other arguments, to be sure, about performance contracting. The U.S. Department of Labor, apparently suspecting that some subcontractors, far from suffering from the constraints of rigorous contract requirements, are pocketing profits from quick placement programs operated under fixed unit price performance contracts, is currently proposing rules which tighten up procedures and impose stringent audit and monitoring requirements. Moreover, the suspicion persists that performance contracting has emerged largely as a ruse for SDAs to pocket all the allowable administrative costs (15% of total Title II-A funds), while burying costs of management at the subcontract level in the "training" category, thereby creating a false impression about what it costs to manage JTPA. Both suspicions appear to have some merit, though it appears that only a very few local subcontractors are pocketing any serious profits, while it is almost certainly true that management and administrative costs are hidden in most performance-based subcontracts.

The policy point, however, remains the same. In the words of one SDA administrator we interviewed, "performance contracting is a tool—nothing more, nothing less. If I'm any good, I can use that tool to cream so I can exceed performance standards and bury admin. costs or else I can use it to serve special populations in this town that need our help and to hold our contractors accountable for their program and fiscal performance. It's value-neutral; it all depends on what you use it for" (Brandeis interview, 1988).

Competency Systems: the search for individual bottom lines

In an ideal, centrally-based, outcome-directed system where service delivery was decentralized, one could imagine that performance measures issued nationally, adjusted and enforced at the state and local levels, would be reinforced by contracts which incorporated the same objectives with service delivery agencies.These agencies would include in their instructional and service plans the building blocks which would produce in clients the individual learning and behavior which were required. Indeed, something like that is the vision behind JTPA. But only for youth have those outcomes been any more programmatic than placement and cost. The competency movement has only in rare instances hit the adult training system. In this respect, adult vocational education is considerably more developed than JTPA.

The 1982 law provided that meeting "PIC-approved competencies" would qualify a youth as a successful graduate of JTPA. As the Department of Labor further defined it, this meant that

SDAs and states could define as a "positive termination" all youth who met at least one of the local PIC's criteria of competence in "pre-employment or work maturity skills," in "basic skills," including reading and math, or in "job specific skills," such as might be gained in an occupational training program or through on-the-job training.

Due at least in part to the changes in performance measures for youth and strong encouragement from state level JTPA officials, virtually all Service Delivery Areas have adopted PIC-approved competency systems for prevocational outcomes, and smaller proportions have done so for outcomes that are more closely related to the needs of specific employers. As patient advocates for more competency-based programming in employment and training programs, we were surprised at the extent to which the concept had penetrated the system, but disappointed that it had not taken hold much beyond the pre-vocational outcomes taught in short-term, pre-placement programs like job search assistance and pre-employment training. A 1985 survey by the National Alliance of Business documented that 81% of SDAs contacted had some form of competency-based program in place and another 9% had plans for doing so. As shown in Exhibit 6, we hoped to go just a step deeper, to find out in what areas competency-based programming was taking place.

Exhibit 6

Use of competency systems in youth programs

	Work Maturity	Pre-emp't/ Basic Educat. Skills	Job Specific Skills (Classroom)	Job Specific Skills (OJT)
Brandeis Survey (PY 1988)	92.2%	81.2%	31.3%	54.7%
NAB Survey (PY 1985)				
In place	--	--	--	--	81.3%
In place or planned	--	--	--	--	89.4%

Ten (12%) of the SDAs we spoke to said they "were considering," or "had plans" to implement some form of competency-based programming for adults, but none reported that they had done so. Three reported that they "thought" that one or another of their subcontractors—all community colleges—operated their classroom training for both youth and adults as competency-based, but none were certain. Literally everyone we spoke to who had an opinion on the subject

agreed that competency-based programming was "more appropriate" for youth, while harder-edged outcome measures like job placement, wages and retention were more suited to their adult program graduates. One SDA director reported having proposed to her Private Industry Council that they explore competency-based outcome measures for contracts to serve adult illiterates (on grounds that near-term placement was not a feasible outcome goal) and was accused by one member of "wimping out on the bottom line." She dropped the proposal.

While there continues to be some talk about adult competencies, the development has been real only in the youth area. There, for the first time, and after several years of wrangling between DOL (which wanted competency measures) and the Office of Management and Budget (which resisted them), a new measure, called "employability enhancement rate" has been approved for measuring youth outcomes. Part of the "positive termination" rate, it means that for the first time in Program Year 1988 local programs, in states where the governor has chosen it as one of the eight standards from the "menu," will report their accomplishments in terms of progress towards employability, as measured by achievement of certain competencies approved by the Private Industry Council. If that seems a little convoluted in the describing, it is likely to be more so in implementation.

"Employability enhancement," while a goal subscribed to by all the practitioners to whom we spoke, is in implementation the conceptual opposite of the impulse for simplicity striven for in the initial performance standards. And states are approaching its adoption cautiously. Fewer than 50% of the SDAs we surveyed reported plans to use the standards this year, reflecting the number of states which have authorized payment according to that outcome, and only 10% more expect to incorporate the standard next program year. Why? "It's complicated," said one SDA director, " and my PIC is used to—no, insists on—simple."

Why is it complicated? Basically, it appears that SDA staffs, accustomed to the more straightforward measures of performance like placement and wage levels, are daunted by the planning tasks involved in development of genuine competency systems. This factor appears to account for the use of competencies primarily in short-term programs to date, as well as the caution exhibited in going further. Designing a competency system in JTPA will require several steps, at least the following:

- surveying local employer needs
- designing a system of program services which appear likely to respond to those needs
- developing a "map" of the competencies which will have to be provided to participants through experience and instruction
- developing adequate assessment, monitoring, and certification mechanisms

- developing mechanisms and selecting instruments for client appraisal and for progress- and post-testing of client accomplishments
- developing or acquiring curriculum that matches employer needs to client status and abilities
- developing contracting mechanisms which reach past placement and cost measures and include documentation of client or student progress.

Perhaps more important, because the technicalities of such a task are certainly not beyond present capacities—even though they are hard—SDAs will need to convince PICs, subcontractors, and not least themselves, that it is worth forgoing short-term, quick client placement for longer, probably more expensive training programs which may not be as readily bottom-line-measurable as they have become accustomed to.

They will need help and political support even if they develop the local will and apply themselves to the technical task. There is some promise of help. Apparently DOL is looking to this approach to temper the problems it perceives with the performance standards and the impact of performance contracting, and plans to target technical assistance resources to the task. Most states appear to have offered both encouragement and help for SDAs who want to add to their present pre-employment/work maturity systems. Roughly four of every five SDAs in our sample (79.7%) reported receiving encouragement from their states to develop and implement systems to assess achievement of specified competencies. Moreover, the encouragement has been an ongoing process, having been felt for three or more years in two-thirds (67.4%) of the SDAs which reported such encouragement. Not surprisingly, state efforts to promote competencies tended to focus on service to youth, but there are some instances of broader encouragement, e.g., to explore competencies for all client groups.

The basic policy question for JTPA regarding competency systems is a variant of the ones raised by performance standards and contracting. That is, will the system accept the accomplishment of measurable competencies by participants as legitimate objectives, and therefore acceptable outcome measures? Or must the process be kept as simple and measurable as a few placement and cost measures imply? So far, the answer from federal policy makers has been timid. Yes, they say, competencies are an acceptable outcome measure for youth, but not for adults. But even for youth, it may only be part of this "positive termination" measure, and it doesn't really "count" as much as entered employment rates. The fear seems to be that if competencies are an accepted outcome, local SDAs will compromise the harder-line measures of cost and placement rates, and substitute competencies in too many cases.

Conclusion and Recommendations

The JTPA drive for performance appears to be working pretty well. The performance measures, while possibly too few and too simple, are the right ones, and recent federal changes appear to compensate for some of the shortcomings of the earlier simplicity. The approaches to state and local adjustment are very important local tailoring provisions, but they appear not to be working very well, and much more thought and technical assistance will be required to make them effective. Some of the costs and quality shortfalls which may be concealed by performance contracting are worrisome, but the basic approach makes sense and is unlikely to be thrown out even though it is currently under sharp scrutiny. The capacity to turn national and state outcome measures and standards into specifications for local programs, and to incorporate them into contractual arrangements is a signal advance, and ought to be maintained. The potential for abuse is clearly there, however, and without new rules, incentives, and technical assistance, local contracting procedures could, paradoxically, work in the long run against achievement of a genuinely outcome-driven system for employment and training for the disadvantaged.

The most difficult, and in my view programmatically significant development, competency-based training and education, has spread wide but not deep in the system, reflecting the extent to which JTPA is still smarting from its CETA legacy. Federal and local officials alike are determined to maintain what feels like a hard-won reputation for tough-minded measures and standards. Accordingly, any development which may complicate the bottom-line picture for which they strive is viewed with mistrust. Nonetheless, there is some discomfort that the performance measures and standards, contracting, and budget reductions may have conspired to tilt the system towards the most job-ready and away from the more complicated clients (who will take longer, cost more, succeed in smaller numbers . . .). Whether it is true is hard to prove. Logically, it is likely that the tilt has taken place, although it is splitting a pretty fine hair in general society to talk about "creaming" from members of the pool of people whose economic status makes them eligible for JTPA services.

What are the implications for vocational education for adults? First, JTPA has demonstrated that it is possible to establish a national program substantially driven by clearly-specified, measurable outcomes. Moreover, it is possible to tie those outcomes to funding, not only at the federal and state levels, but even down to the level of actual service delivery through performance-based contracts with educational institutions or community agencies. As policies which will underlie vocational education are developed, JTPA's experience should encourage planners that a focus on outcomes can be achieved.

Secondly, the performance objectives and the tools designed to achieve them are never truly "value-neutral," as one of our SDA interview subjects asserted, but they are relatively manipulable. For example, while JTPA observers argue over creaming from among an eligible population of America's disadvantaged, vocational education has not ever really decided to what extent it ought to target certain parts of the population. The lesson from JTPA is that both national and state standards and local contracting procedures can be designed and managed to accomplish targeting objectives.

Third, while performance contracting has some problems, JTPA's experience with them is encouraging. It appears that it is possible to write local contracts with educational institutions and community agencies which link payment to specific outcome objectives, and to be planful in pursuing a mixed strategy in a community that can produce a range of outcomes, tailored to and produced by different agencies according to their capabilities and connections with the community. Performance contracting may be the mechanism by which state officials can, if they wish, spread training responsibility among, say, community colleges, community-based organizations, proprietary schools and even businesses, with public attention to their relative achievement of performance objectives. Carefully handled, performance contracts can even change the nature of the local turf dialogue among training providers.

Fourth, it is probable that vocational education has more to offer JTPA in the area of competency-based curriculum and program design than the reverse. JTPA is working hard in the youth area, and the new performance measures being proposed for future years may open up the subject for adults as well. But the technology is little developed. Do vocational educators know more? I suspect so. We ought to look there for lessons, as well.

Finally, it may be possible, if vocational education continues to move in the direction of outcome-based management, for the two systems to become more integrated with each other. Those of us who work in one part of the field or the other may understand the distinctions, but the general public does not, and certainly Congressional and state legislators who ultimately make the policies and vote on whether and to what extent to fund them are not comfortable that one hand knows what the other is doing. Moving both systems in the direction of outcome-based programming and management may bring the two closer together to the benefit of both.

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